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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE  
IN SUPPORT OF DEFENDANT OTTO  
TRUCKING LLC'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS LETTER BRIEF IN  
OPPOSITION TO WAYMO'S MOTION TO  
COMPEL DISCOVERY AND EXHIBITS  
THERE TO [DKT. 1994]**

Courtroom: 8, 19th Floor  
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, Neel Chatterjee, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of Otto Trucking’s Letter Brief in Opposition to Waymo’s Motion to Compel Discovery and exhibits thereto (the “Administrative Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Letter Brief	Highlighted Portions	Defendants (blue highlighting)
Exhibit B to the Walsh Declaration	Entire Document	Defendants Plaintiff

3. The highlighted portions of Otto Trucking’s Letter Brief contain information that Plaintiff Waymo LLC (“Waymo”) and Defendants have designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate.

4. Otto Trucking anticipates that Waymo and Defendants Uber and Ottomotto will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

5. Exhibit B to the Walsh Declaration contains information that Plaintiff Waymo LLC (“Waymo”) and Defendants Uber and Ottomotto have designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no position about whether the confidentiality designations are appropriate. Otto Trucking

1 anticipates that Waymo will file any necessary declarations to seal the above information pursuant  
2 to Local Rule 79-5.

3 6. Otto Trucking's request to seal is narrowly tailored to those portions of Otto  
4 Trucking's Letter Brief and its supporting documents that merit sealing.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is  
6 true and correct. Executed this 17th day of October, 2017 in Menlo Park, California.

7  
8 /s/ Neel Chatterjee  
NEEL CHATTERJEE

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 17, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 17, 2017**.

/s/ Neel Chatterjee  
NEEL CHATTERJEE